UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON D.C., 20460

OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

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MEMORANDUM

SUBJECT: **Revised Memo:** Need for Environmental Risk Assessment of Sergeant's Fipronil + Cyphenothrin BOV Spray for Dogs

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5/16/13

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This memo is a revision of the "Need for Environmental Risk Assessment of Sergeant's Fipronil + Cyphenothrin BOV Spray for Dogs" dated April 5, 2013 under ~~the same~~ DP barcode. 410145

On February 12, 2013, Sergeant's Pet Care Products, Inc. submitted applications for registration for the following new end-use spray products to control fleas and ticks on dogs:

- Sergeant's Fipronil + Cyphenothrin BOV Spray for Dogs, (Primary Application);
- Sergeant's Fipronil + Cyphenothrin + Methoprene BOV Spray for Dogs, (Secondary Application); and
- Sergeant's Fipronil + Cyphenothrin + Pyriproxyfen BOV Spray for Dogs, (Secondary Application).

Each of the three proposed formulations contain the active ingredients, fipronil (0.29%) and cyphenothrin (0.10%). Further, one formulation is supplemented with (S)-methoprene (0.27%), and another product formulation is supplemented with pyriproxyfen (0.125%).

Current EFED policy is to assess environmental risk from pesticidal pet shampoos, but not from pet spot-on products. The logic behind this policy is that shampoos will likely wash down the drain to waste-water treatment plants and eventually to effluent receiving water bodies during the pesticide application process, while spot-on products typically include instructions to not wash animals for some period of time after application. The spray-on treatment described on these labels appears to be more like the spot-on treatment with the exception that there appears to be no restrictions on how soon the animal can be washed after application. (The label does include instructions to wash the animal immediately if it exhibits signs of sensitivity to the product. EFED assumes this will be an uncommon occurrence.)

In the original (non-revised) memo, EFED interpreted this product to be more similar to a shampoo, which would require an ecological risk assessment be performed. After meeting with the Fipronil Task Force (May 14, 2013), EFED now considers this use pattern to be more similar to the spot-on product and therefore believes that an ecological risk assessment is unnecessary.

Therefore because there appears to be no complete exposure pathway between the pesticide application and the ecological resources of concern (under normal circumstances in which the animal does not show sensitivity to the product), EFED does not see a need to perform an ecological risk assessment for these proposed registrations. However, it may be beneficial to include a statement on the label that animals should not be bathed after product application for a period of *X* hours or days unless the animal shows of sensitivity to the product, where *X* would be based on the time required for the product to become relatively unavailable for wash off from the animal.